

# Exhibit AI



Deposition of:  
**Steven Compton , Ph.D.**

*February 28, 2020*

In the Matter of:  
**Zimmerman, Linda Vs. Autozone Inc.,  
Et Al.**

**Veritext Legal Solutions**  
800.808.4958 | [calendar-atl@veritext.com](mailto:calendar-atl@veritext.com) | 770.343.9696

<p>1 Q No, I mean, and I get -- and your 2 response is a fair one, but I'm just here trying 3 to get the opinions that you're going to offer at 4 trial, and I guess the threshold is that you, 5 before I asked the question, you were not aware 6 that such a report by Dr. Gordon existed; right? 7 A Specific to this case I don't recall 8 one way or the other. I know that it's commonly 9 often something that is done, and when I'm asked 10 about them, it's more in the line of whether or 11 not the types of fibers that were discovered in a 12 tissue digestion are consistent with the types of 13 fibers that can be found in talc. 14 So if I were asked any questions like 15 that, I would expect to receive information about 16 the report that you're talking about in some form 17 of a hypothetical. 18 Q And how do you go about -- let's say 19 I give you a hypothetical about what the tissue 20 digestion showed, how would you go about 21 analyzing the question you just posed? 22 MS. SIMON: Objection. Vague. 23 Speculation. 24 THE WITNESS: I guess what I have in 25 my mind isn't so much of an analysis, it's just a</p>	<p>Page 18</p> <p>1 Q Just to be clear, though, you're 2 not -- as you sit here today, you're not aware of 3 any data supporting the notion that there has 4 been crocidolite found in Johnson &amp; Johnson 5 cosmetic talc source? 6 A Well, the difference between amosite 7 and crocidolite is typically attributed to the 8 presence of sodium, so as long as that can't be 9 explained then, no, I mean, I can't think of any. 10 Q Okay. Let's talk a little bit about 11 the MAS specific, case-specific report. You have 12 reviewed that report? 13 A I have. 14 Q And what are your or how does that 15 report inform your opinions in this case? 16 A Well, to the extent that these are 17 finished products that come from or that can be 18 tied directly to Linda Zimmerman, that's 19 important to know. 20 I don't expect that I'll be asked a 21 lot of questions about the details of the report. 22 It's my understanding that there were two 23 different samples from a couple of different 24 vintages, but... 25 Q Are you finished, Doctor? I don't</p>
<p>1 question of given a list of mineral types, are 2 these mineral types that you have found in talc. 3 BY MR. EWALD: 4 Q Okay. So, for example, let's say the 5 tissue digestion shows amosite. Is that the type 6 of mineral that has been found in cosmetic talc? 7 A It depends on what source you're 8 talking about. Most commonly the minerals that 9 are associated with talc include chrysotile and 10 tremolite, actinolite, anthophyllite, although 11 amosite is more generally known as part of the 12 cummingtonite-grunerite series of minerals. 13 It is something that I've seen in 14 particular in one sample of rock from the Italian 15 mine, and then Dr. Sanchez from RJ Lee Group has 16 reported findings of cummingtonite in a number of 17 different talc samples. 18 Q What about crocidolite? 19 A Crocidolite, so that's an asbestos 20 mineral under the general name of riebeckite. 21 Nothing that I can think of from memory, but it 22 should be understood that all of these minerals 23 are related to each other in the sense that 24 they're amphibole magnesium silicates, 25 particularly calcic for some of them.</p>	<p>Page 19</p> <p>1 want to cut you off. 2 A I think I'm finished, yes. 3 Q Okay. Have you reviewed the 4 entirety of the report? 5 A I think the report that I received 6 was about 100 pages long, so if that's the 7 entirety of the report, then, yes. 8 Q Well, and that sounds about right. I 9 guess what I was getting at too is have you, for 10 example, reviewed the various PLM images that 11 were contained in the report? 12 A It's something that I would look at, 13 yes. 14 Q And having reviewed the hundred and 15 so pages of MAS's Zimmerman analysis dated 16 February 24, 2020, do you agree with MAS's 17 conclusions that chrysotile was found in both 18 bottles? 19 A I didn't see anything in there that 20 would cause me to disagree. 21 Q Well, having reviewed the report, do 22 you affirmatively agree with MAS that chrysotile 23 is present in the two samples that were analyzed? 24 A I think the question that you're 25 asking me would require me to analyze the sample</p>

<p>1 itself. I don't know that looking at the data      2 alone can allow me to independently verify      3 another lab's findings, but I can tell you      4 whether or not I did see any issues with it and      5 in this case, I didn't see any issues.</p> <p>6 Q So in reviewing the PLM images      7 included within the MAS report, you do agree that      8 what Dr. Longo finding is chrysotile?</p> <p>9 MS. SIMON: Asked and answered.</p> <p>10 THE WITNESS: Without looking at the sample myself, I can't independently verify the results, if that's what you're asking. I need to look at the sample. But after reviewing the report, I don't see any issues with what they're calling chrysotile based on the method that they used.</p> <p>17 BY MR. EWALD:</p> <p>18 Q And what is your understanding of the method that they used?</p> <p>20 A Well, in general, polarized light microscopy, but it's an application of the ISO 22262-1 method with heavy liquid separation and iodine staining.</p> <p>24 Q Have you talked to Dr. Longo about his testing reflected in the February 24, 2020,</p>	<p>Page 22</p> <p>1 Q Well, how often are you in the lab on 2 a PLM?</p> <p>3 MS. SIMON: Speculation.</p> <p>4 THE WITNESS: It varies depending on 5 what kind of work we're doing.</p> <p>6 BY MR. EWALD:</p> <p>7 Q I appreciate that answer, but can you 8 give me any kind of estimate about, let's just 9 say, in a given year how many days where you 10 spend at least some time working with PLM?</p> <p>11 MS. SIMON: Asked and answered.</p> <p>12 Speculation.</p> <p>13 THE WITNESS: I would say I'm in that 14 lab about once a week.</p> <p>15 BY MR. EWALD:</p> <p>16 Q Do you know what the refractive index 17 of chrysotile and parallel and perpendicular 18 distinction is?</p> <p>19 A We have tables for that information.</p> <p>20 It's not that something that I have committed to 21 memory, though.</p> <p>22 Q Okay. And what tables? Is there a 23 particular one that you rely on?</p> <p>24 A Well, the tables that come to mind 25 are either in the EPA R-93 method or information</p>
<p>1 report for this case?</p> <p>2 A Not these specific samples, no.</p> <p>3 Q Have you talked to Dr. Longo about 4 his heavy liquid separation technique for 5 chrysotile?</p> <p>6 A It's something I've seen him present 7 on.</p> <p>8 Q Apart from what you've seen 9 presentation wise with Dr. Longo, have you had an 10 individual conversation with Dr. Longo about his 11 heavy liquid separation for chrysotile technique?</p> <p>12 A Not that I can think of.</p> <p>13 Q Remind me how much experience do you 14 have with PLM?</p> <p>15 MS. SIMON: Objection. Vague.</p> <p>16 THE WITNESS: Aside from on-the-job 17 training, I've also taken a class that was 18 provided by McCrone Research Institute on applied 19 polarized light microscopy that was in 2010.</p> <p>20 BY MR. EWALD:</p> <p>21 Q And when you talk about on-the-job 22 training, do you consider yourself a capable PLM 23 analyst?</p> <p>24 A Capable of interpreting results. I'm 25 not in the lab every day on a PLM.</p>	<p>Page 23</p> <p>1 that's been reported by Deer, Howie, and Zussman.</p> <p>2 Q Dr. Compton, are you going to be 3 offering any plaintiff-specific exposure opinions 4 in this case?</p> <p>5 A Opinions that I believe would relate 6 exclusively to Ms. Zimmerman as opposed to other 7 people who may have used talc in the past?</p> <p>8 Q Yes.</p> <p>9 A Not that I can think of.</p> <p>10 Q And just to put a little bit of a 11 finer point on it, I know that you sometimes 12 testify as to general expected exposure from 13 cosmetic talc in talking about, in particular, 14 the Gordon, Millette 2014 study. Does that sound 15 right?</p> <p>16 A Yes, that's something of an estimate.</p> <p>17 Q But you are not intending to offer 18 any opinions in this case that are specific to 19 Ms. Zimmerman's use of Johnson's baby powder and 20 Johnson's talc products in general?</p> <p>21 A In my Declaration I discuss some of 22 that fiber release testing that was done, so I 23 wouldn't anticipate providing any opinions 24 outside of what I discussed in that document.</p> <p>25 Q Okay. Thank you. That's helpful. I</p>

## Zimmerman, Linda Vs. Autozone Inc., Et Al.

<p>1 CERTIFICATE 2 STATE OF GEORGIA: 3 COUNTY OF COBB: 4 I hereby certify that the foregoing 5 deposition was taken down, as stated in the 6 caption, and the colloquies, questions and 7 answers were reduced to typewriting under my 8 direction; that the transcript is a true and 9 correct record of the evidence given upon said 10 proceeding. 11 That the witness's right to read and 12 sign the deposition was reserved; 13 I further certify that I am not a 14 relative or employee or attorney of any party, 15 nor am I financially interested in the outcome of 16 this action. 17 I have no relationship of interest in 18 this matter which would disqualify me from 19 maintaining my obligation of impartiality in 20 compliance with the Code of Professional Ethics. 21 I have no direct contract with any party 22 in this action and my compensation is based 23 solely on the terms of my subcontractor 24 agreement. 25 Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.</p> <p>This 3rd day of March, 2020.</p> <p><i>Sharon E Jordan</i></p> <p>SHARON E JORDAN, RPR, CCR-B-2126</p>	Page 102	<p>1 ERRATA for ASSIGNMENT # 2 I, the undersigned, do hereby certify that I have 3 read the transcript of my testimony, and that 4 _____ There are no changes noted. 5 _____ The following changes are noted: 6 Pursuant to Rule 30(7)(e) of the Federal Rules of 7 Civil Procedure and/or OCGA 9-11-30(e), any 8 changes in form or substance which you desire to 9 make to your testimony shall be entered upon the 10 deposition with a statement of the reasons given for making them. To assist you in making any 11 such corrections, please use the form below. If 12 additional pages are necessary, please furnish 13 same and attach. 14 Page No. _____ Line No. _____ Change to _____ 15 _____ 16 Reason for change _____ 17 Page No. _____ Line No. _____ Change to _____ 18 _____ 19 Reason for change _____ 20 Page No. _____ Line No. _____ Change to _____ 21 _____ 22 Reason for change _____ 23 Page No. _____ Line No. _____ Change to _____ 24 _____ 25 Reason for change _____</p>
<p>1 To: Steven P. Compton, Ph.D. 2 Re: Signature of Deponent 3 Date Errata Due back at our offices: 4/3/20 4 5 Greetings: 6 This deposition has been requested for read and sign by the deponent. It is the deponent's 7 responsibility to review the transcript, noting any changes or corrections on the attached PDF 8 Errata. The deponent may fill out the Errata electronically or print and fill out manually. 9 Once the Errata is signed by the deponent and 10 notarized, please mail it to the offices of Veritext(below). 11 When the signed Errata is returned to us, we will 12 seal and forward to the taking attorney to file with the original transcript. We will also send 13 copies of the Errata to all ordering parties. 14 If the signed Errata is not returned within the time above, the original transcript may be filed 15 with the court without the signature of the deponent. 16 17 Please send completed Errata to: 18 Veritext Production Facility 19 20 Mansell Court, Suite 300 20 Roswell, GA 30076 21 (770) 343-9696 22 23 24 25</p>	Page 103	<p>1 Page No. _____ Line No. _____ Change to _____ 2 _____ 3 Reason for change _____ 4 Page No. _____ Line No. _____ Change to _____ 5 _____ 6 Reason for change _____ 7 Page No. _____ Line No. _____ Change to _____ 8 _____ 9 Reason for change _____ 10 Page No. _____ Line No. _____ Change to _____ 11 _____ 12 Reason for change _____ 13 Page No. _____ Line No. _____ Change to _____ 14 _____ 15 Reason for change _____ 16 Page No. _____ Line No. _____ Change to _____ 17 _____ 18 Reason for change _____ 19 _____ 20 DEPONENT'S SIGNATURE 21 Sworn to and subscribed before me this _____ day of _____, 20 _____. 22 _____ 23 _____ NOTARY PUBLIC 24 _____ 25 My Commission Expires: _____</p>

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